

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MISSOURI

IN RE:)	CASE NO. 17-46266-659
)	
KIMBERLY G. SEEMES,)	CHAPTER 13
)	
Debtor.)	
)	
CAVALRY SPV I, LLC,)	
)	
Claimant.)	

RESPONSE TO OBJECTION TO CLAIM

NOW COMES Claimant, Cavalry SPV I, LLC (“Creditor”), and for its
Response to the Trustee’s Objection to Claim 9 (Document #20), states as follows:

1. Creditor has provided certain documentation requested by the
Trustee to establish its status as a secured creditor, and is diligently assembling the
additional requested documentation for the Trustee’s review.
2. Creditor will further amend the claim, if necessary.

WHEREFORE, Creditor requests that the Court deny the Objection to
Claim, and grant such other and further relief as the Court deems just and equitable under
the circumstances.

Respectfully submitted,

Hanna & Volmert, LLC

By _____

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Attorneys for Creditor

CERTIFICATE OF SERVICE

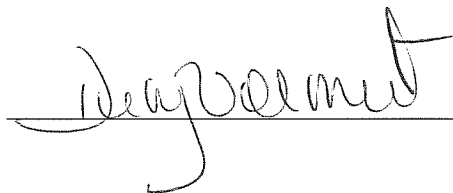
The undersigned hereby certifies that true and accurate copies of the foregoing Response to Objection to Claim were served via electronic notification on this 19th day of March, 2018:

Brent S. Westbrook, attorney for Debtor

Diana S. Daugherty, Chapter 13 Trustee

And to the following by first class mail, postage pre-paid, on this 19th day of March, 2018:

Kimberly G. Seemes
2925 Park Valley Drive
St. Peters, MO 63376

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